

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth.**

ORDER GRANTING THREE HUNDRED EIGHTH OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS THAT
ARE PARTIALLY DEFICIENT AND PARTIALLY BASED ON COFINA BONDS

Upon the *Three Hundred Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims that are Partially Deficient and Partially Based on COFINA Bonds* [ECF No. 16026] (the “Three Hundred Eighth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (“Commonwealth”), dated March 12, 2021, for entry of an order

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Eighth Omnibus Objection.

disallowing in their entirety certain claims filed against the Commonwealth, as more fully set forth in the Three Hundred Eighth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Eighth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Eighth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in Exhibit A to the Three Hundred Eighth Omnibus Objection (the “Deficient Bond Claims”) seek recovery, in part, of amounts for which the Commonwealth is not liable; and the Court having determined that the relief sought in the Three Hundred Eighth Omnibus Objection is in the best interests of the Commonwealth, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Eighth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Eighth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Eighth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Deficient Bond Claims are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate the Deficient Bond Claims as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 16026 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Eighth Omnibus Objection

Three Hundred and Eighth Omnibus Objection
Exhibit A - No Liability + Deficient Bondholder Claims

NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1 GUZMAN, LILLIAN BROMELIA #51 PANJUN DE BURNE GUAYNABO, PR 00969	6/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	162219	\$ 285,000.00
Reason: Claimant appears to assert, per best effort reviewing proof of claim, supporting documentation, bond name(s) at issue, and/or the CUSIP information, in part, liability based on an alleged ownership of COFINA Bonds. This portion of the claim thus seeks recovery for amounts for which the Commonwealth is not liable because the claims were (1) compromised and settled pursuant to the Settlement Order, and (2) released and discharged in accordance with the Plan and Amended Confirmation Order. Any remaining portion of the claim is deficient because it fails to comply with the applicable rules for filing a claim and/or provide sufficient information to enable the Debtors to reconcile the proofs of claim.					
2 GUZMEN DE AMADOR, IRMITA CONDOMINO PLAZA DEL PRADO #5 CALLE 833 APT. 1203B GUAYNABO, PR 00969	6/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	88518	\$ 404,540.32
Reason: Claimant appears to assert, per best effort reviewing proof of claim, supporting documentation, bond name(s) at issue, and/or the CUSIP information, in part, liability based on an alleged ownership of COFINA Bonds. This portion of the claim thus seeks recovery for amounts for which the Commonwealth is not liable because the claims were (1) compromised and settled pursuant to the Settlement Order, and (2) released and discharged in accordance with the Plan and Amended Confirmation Order. Any remaining portion of the claim is deficient because it fails to comply with the applicable rules for filing a claim and/or provide sufficient information to enable the Debtors to reconcile the proofs of claim.					
3 LAWRENCE E. DUFFY, EDDA PONSA DUFFY & THEIR CONJUGAL PARTNERSHIP PO BOX 13615 SAN JUAN, PR 00908	5/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	45233	\$ 302,751.33
Reason: Claimant appears to assert monetary amount yet does not include matching brokerage statements pertaining to referenced CUSIP. Further, Claimant appears to assert, per best effort reviewing proof of claim, supporting documentation, bond name(s) at issue, and/or the CUSIP information, liability based on an alleged ownership of COFINA Bonds, and thus seeks recovery for amounts for which the Commonwealth is not liable because the claims were (1) compromised and settled pursuant to the Settlement Order, and (2) released and discharged in accordance with the Plan and Amended Confirmation Order.					
4 MOLINA CUEVAS, ENRIQUE PO BOX 29 NARANJITO, PR 00719	5/16/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	13300	\$ 71,142.74*
Reason: Claimant appears to assert, per best effort reviewing proof of claim, supporting documentation, bond name(s) at issue, and/or the CUSIP information, liability based on an alleged ownership of COFINA Bonds, and thus seeks recovery for amounts for which the Commonwealth is not liable because the claims were (1) compromised and settled pursuant to the Settlement Order, and (2) released and discharged in accordance with the Plan and Amended Confirmation Order.					
					TOTAL \$ 1,063,434.39*